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October 29, 2024

By ECF

Honorable Barbara Moses
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Yuanjun Tang
24 Mag. 3056

Your Honor:

I represent Yuanjun Tang in the above-referenced matter. I write to respectfully request that his bail be modified from home detention to curfew, with the hours as directed by Pretrial Services. Both the government and Pretrial Services consent to this request. Since his release on August 21, 2024, he has complied with his current conditions of release: travel restricted to SDNY/EDNY; surrender travel documents and no new applications; pretrial supervision as directed by Pretrial Services; home detention; location monitoring technology; GPS; no contact with victims or witnesses. *See* ECF No. 5. Mr. Tang is 67 years old and has no prior criminal convictions. The parties agree that the remaining conditions of release would suffice to ensure the safety of the community and Mr. Tang's return to court.

Accordingly, the parties respectfully request that his bond be modified from home detention to curfew, with hours set as directed by Pretrial Services. We greatly appreciate the Court's time and consideration of this matter.

Respectfully submitted,



Michael D. Bradley, Esq.
Counsel for Mr. Tang

cc: AUSA Jane Chong (*via ECF*)